



KERN IRWMP

Integrated Regional Water Management Plan

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September 21, 2009

California Department of Water Resources
ATTN: Ralph Svetich
P.O. Box 942836
Sacramento, CA 94236-0002

Re: Poso Creek Integrated Regional Water Management Plan Region
Acceptance Process Draft Recommendation

Dear Mr. Svetich:

The Tulare Lake Basin Portion of Kern County Integrated Regional Water Management Plan (Kern IRWMP) would like to thank you for the opportunity to comment on the Region Acceptance Process (RAP) draft recommendations.

The Kern IRWMP covers the entire Tulare Lake Basin portion of Kern County. A portion of this region in northern Kern County is also covered by the Poso Creek IRWMP. As described in the respective RAP applications, both the Kern and Poso Creek IRWMPs seek to address the agricultural water management concerns in the overlapping region. In addition to the agricultural concerns, the Kern IRWMP is currently working to address watershed management and urban water management concerns of the communities in the area, many of which are disadvantaged communities (DACs). As such, the Kern IRWMP has a vital interest in the outcome of the RAP applications of both the Kern and Poso Creek IRWMPs.

The draft RAP recommendation for the Poso Creek IRWM states that the region has received conditional acceptance in order to apply for implementation grant funding in next round. The Kern IRWMP Executive Committee finds that the RAP guidelines do not support this recommendation. The Kern IRWM Region will be providing DWR its comments upon how the various statewide RAP results have unilaterally strayed from the published guidelines in the near future.

The Kern IRWM Region would also like to express its support for DWR's decision to require the Poso Creek IRWM Region to integrate with the Kern IRWM. Prior to the RAP, the Kern IRWM had, on multiple occasions, invited the Poso Creek region to join our planning process without success. We now look forward to a renewed effort to integrate the Poso Creek IRWM region into the Kern IRWM. That being said, we believe that the draft RAP

recommendations do little to encourage the Poso Creek IRWM region to participate in the Kern IRWM, and in fact have the potential to delay the process by encouraging the continued planning efforts of the Poso Creek RWMG.

For instance, the draft RAP recommendation requires the Poso Creek IRWM Region to join the Kern IRWM Region. However, in the last paragraph of the "General Description" DWR encourages the Poso Creek IRWM Region to continue to work with the DACs to "effectively include DACs into Poso Creek IRWM planning efforts." This implies that the Poso Creek IRWM will continue to exist as a planning entity. Requiring the Kern and Poso Creek IRWM Regions to integrate, while encouraging the Poso Creek IRWM to continuing its planning efforts sends a mixed message that has the potential to severely inhibit the progress of the Kern IRWMP by delaying the integration efforts of the Poso Creek IRWM. In order to provide a consistent message that the Kern IRWM Region is the appropriate planning region and acknowledge the successful collaborative efforts of the Kern IRWM Region to date, DWR should amend the draft RAP recommendation to include language requesting the Poso Creek IRWM to begin integrating with the Kern IRWM, which includes the referenced DACs, immediately rather than encouraging the Poso Creek IRWM planning efforts to continue. We request that DWR amend its recommendations in a way that better facilitates and promotes the timely integration of Poso Creek into the Kern IRWM. To that end, the Kern IRWM recommends that the last paragraph of the "General Description" section be removed and the second paragraph of the "Interview Conclusions" be amended to read as follows:

"The Poso Creek RWMG must consolidate their IRWM planning efforts with the Kern County IRWM Region to ensure effective regional planning and integrated water management. The Poso Creek RWMG should make every effort to begin the integration process immediately and not wait until the completion of the implementation funding round."


In summary, we request that DWR reconsider the Poso Creek RAP application on the basis of the information presented above.

If you have any questions or would like to discuss these matters, please contact the undersigned or Lauren Bauer at (661) 634-1411.

Sincerely,



William Miller
Co-chair, Executive Committee
Kern IRWMP



William Taube
Co-chair, Executive Committee
Kern IRWMP

cc: Tracie Billington, DWR
Jim Lin, DWR